

Evaluations of Innovative Pilot Project Innovations

ICR Supporting Statement

EPA ICR No. 1993.01

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Office of Policy, Economics, and Innovation
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Table of Contents

1.0 SHORT CHARACTERIZATION	1
2.0 NEED FOR AND USE OF THE COLLECTION	3
2.1 Need / Authority for the Collection	3
2.2 Use and Users of the Data	3
3.0 NONDUPLICATIONS, CONSULTATIONS, AND OTHER COLLECTION CRITERIA	4
3.1 Nonduplication	4
3.2 Public Notice Required Prior to ICR Submission to OMB	4
3.3 Consultations	4
3.4 Effects of Less Frequent Collection	4
3.5 General Guidelines	4
3.6 Confidentiality	5
3.7 Sensitive Questions	5
4.0 THE RESPONDENTS AND THE INFORMATION REQUESTED	5
4.1 Respondents and SIC Codes	5
4.2 Information Requested	5
5.0 THE INFORMATION COLLECTED: GOVERNMENT ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION	6
5.1 Government Activities	6
5.2 Collection Methodology and Management	7
5.3 Small Entity Flexibility	8
5.4 Collection Schedule	8
6.0 ESTIMATING THE BURDEN AND COST OF THE COLLECTION	8
6.1 Estimating Respondent Burden and Cost	8
-Total Respondents	9

-Permit Respondents	9
6.2 Estimating Agency Burden and Cost	10
- Agency Respondents - Innovative Pilot Project Innovation Evaluations	10
- Agency Respondents -Innovative Pilot Project <i>Permit</i> Innovation Evaluations ..	10
6.3 Estimating the Respondent Universe and Total Burden Costs	12
6.4 Bottom Line Hours and Cost Tables	12
6.5 Reasons for Change in Burden	12
6.6 Burden Statement	13
Attachment -List of Questions to be Used in Developing Permit Innovations Questionnaires	14

List of Tables

Table 1.Example of Innovative Pilot Project Innovations	2
Table 2. Total Respondents - Annual Estimated Respondent Burden and Cost	9
Table 3: Permit Respondents - Annual Estimated Respondent Burden and Cost	10
Table 4: Agency Respondents -Annual Estimated Responded Burden and Cost (Innovative Pilot Project Innovation Evaluations)	11
Table 5: Agency Respondent -Annual Estimated Respondent Burden and Cost (Innovative Pilot Project <i>Permit</i> Innovation Evaluations)	12

EVALUATIONS OF INNOVATIVE PILOT PROJECT INNOVATIONS

1.0 SHORT CHARACTERIZATION

This is a request for approval of ICR No. 1993.01, which authorizes the U.S. Environmental Protection Agency (EPA) to conduct interviews with more than nine non-federal entities in order to evaluate promising innovative pilot project innovations. A 60-day comment period for this ICR in the Federal Register concluded on January 21, 2001.

In 1995, the U.S. Environmental Protection Agency began to solicit innovative pilot projects in response to a challenge to transform the environmental regulatory system to better meet the needs of a rapidly changing society while maintaining the nation's commitment to protect human health and safeguard the natural environment. Through site-specific agreements with project sponsors, EPA is gathering data and project experience that will help the Agency redesign current approaches to public health and environmental protection. Through these projects, sponsors -- private facilities, multiple facilities, industry sectors, Federal facilities, communities, universities, Tribes and States -- can implement innovative strategies that produce superior environmental performance, provide flexibility, cost savings, paperwork reduction or other benefits to sponsors, and promote greater accountability to stakeholders.

The intent of the innovative pilot projects is to allow the EPA to experiment with untried, potentially promising regulatory approaches, both to assess whether they provide superior environmental performance and other benefits at the specific facility affected, and whether they should be considered for wider application. Such pilot projects allow the EPA to proceed more quickly than would be possible when undertaking changes on a nationwide basis. EPA may modify rules, on a site- or state-specific basis, that represent one of several possible policy approaches within a more general statutory directive, so long as the alternative being used is permissible under the statute.

The adoption of such alternative approaches or interpretations in the context of a given project does not, however, signal EPA's willingness to adopt that interpretation as a general matter, or even in the context of other pilot projects. It would be inconsistent with the forward-looking nature of these pilot projects to adopt such innovative approaches prematurely on a widespread basis without first determining whether or not they are viable in practice and successful for the particular projects that embody them. These pilot

projects are not intended to be a means for piecemeal revision of entire programs. Depending on the results in these projects, EPA may or may not be willing to consider adopting the alternative approach or interpretation again, either generally or for other specific facilities. EPA believes that adopting alternative policy approaches and/or interpretations, on a limited, site- or state-specific basis and in connection with a carefully selected pilot project is consistent with the expectations of Congress about EPA's role in implementing the environmental statutes (so long as EPA acts within the discretion allowed by the statute). Congress' recognition that there is a need for experimentation and research, as well as ongoing reevaluation of environmental programs, is reflected in a variety of statutory provisions.

Since 1995, EPA has implemented pilot projects to test innovative ideas working with offices within EPA headquarters, EPA regions, federal, state, and local government agencies.

In September 2002, EPA would like to begin in-depth evaluations of different innovative pilot project innovations in order to determine which, if any, innovations have the potential for wider application. Currently, EPA has identified more than 65 innovations resulting from projects in implementation. These innovations center around regulations, permitting, environmental information management, compliance and enforcement, environmental stewardship, and stakeholder involvement. Some examples of innovative pilot project innovations are listed in Table 1 below:

Table 1. Example of Innovative Pilot Project Innovations

Innovative Pilot Project Innovation	Category
<i>Facility-wide Permit Air Emission Caps:</i> Flexible use of plant site emission limits, prevention of significant deterioration permit, or plant-wide applicability limits; facility-wide emissions caps allow preapproval of production changes without recurring permit revisions.	Permitting Innovation
<i>Clean Air Act Transportation Control Measure:</i> Flexibility and smart growth applications of a Transportation Control Measure for a brownfield redevelopment project moving forward in area previously out of conformity with the Clean Air Act	Regulatory Innovation

<i>Tiered Reporting:</i> Incentive-based reporting and record-keeping requirements determined by levels of emissions control (through a Prevention of Significant Deterioration permit).	Environmental Information Management and Access Innovation
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From the identified innovations, EPA plans to evaluate a select set the Agency believes has potential for broader application. As more innovative pilot projects move into implementation and more innovations emerge, EPA plans to continue this same process of selecting a set of new innovations and then evaluating them.

As a start, EPA intends to begin evaluating innovative pilot project permit innovations from projects that have been in implementation for at least a year. In order to determine which, if any, permit innovations can be applied on a wider scale, the Agency hopes to learn about the environmental and economic incentives the permit innovations have provided; if other facilities/companies are interested in applying for the same type of innovations; if the innovations need to be tested again before they can be widely adopted; and if the innovations address the public's concerns and stakeholder information needs.

Based upon advice received in consultation with OMB, it was determined that the best way to proceed with this evaluation initiative would be to develop one overarching Information Collection Request (ICR) that discusses EPA's framework for evaluating innovations from innovative pilot projects in general, and in addition outlines EPA's upcoming plan for evaluations of permitting innovations associated with specific innovative pilot projects. This ICR supporting statement is intended to provide the necessary justification for these efforts. If the ICR is approved, EPA will develop additional sets of questions centered around other agency core functions and submit these questions to OMB as a package in the form of an amendment to this ICR.

Included with this ICR supporting statement is the list of questions that EPA will choose from to formulate survey instruments that will be used to gather information on particular permitting innovations from select innovative pilot projects.

2.0 NEED FOR AND USE OF THE COLLECTION

2.1. NEED / AUTHORITY FOR THE COLLECTION

The evaluations are needed to support EPA priorities which include identifying cost effective and superior environmental solutions to continuing environmental problems. Specifically, the evaluations are needed to learn about the positive and negative outcomes of particular innovations both in terms of superior environmental performance, increased economic efficiency, and administrative burden reduction. By definition, the innovations used in different innovative pilot projects are experimental in nature. Without in-depth analysis of these innovations, EPA will be unable to learn which innovations should be considered for broader applicability.

In particular, in regards to permitting innovations, the Agency hopes to learn about the various incentives a particular permit innovation may have provided; if other facilities/companies are interested in applying for a similar type of innovation; if the innovation needs to be tested again before it can be widely adopted, and if the innovation addresses the public's concerns and stakeholder information needs.

2.2 USE AND USERS OF THE DATA

The data resulting from the evaluations will be incorporated into various reports. The findings will then be used to discern which innovations should be integrated into Agency core functions, which need further testing and refining before wide-scale adoption, and which should eventually be retired. Second, the findings will be used to provide information to state, tribal, and local agencies attempting their own unique efforts to transform their regulatory systems. Third, the findings will inform industry representatives and the public, allowing them to better play an active, creative role in finding solutions to environmental problems. Finally, the findings will be used by EPA and Congress to help set the course for future EPA innovative environmental programs.

3.0 NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3.1 Non-duplication

The information to be obtained under this ICR has not been collected by EPA or any other state, tribal, or local agency.

3.2 Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), EPA is currently soliciting comments on specific aspects of this ICR. A Federal Register (F.R.) notice for this ICR package was first published in the Federal Register on November 22, 2000, (FR 65 70345). One public comment was received from a state environmental agency; however, the comment did not pertain to the proposed information collection request.

3.3 Consultations

This notice was developed by a team consisting of EPA headquarters and regional personnel.

3.4 Effects of Less Frequent Collection

The information collection could not be conducted less frequently. The evaluations are necessary to determine which innovations should be transferred into the EPA's national system of environmental protection. Although there are several innovations already identified, with several more emerging as more projects move into implementation, EPA in no way intends to perform evaluations for every innovation that is identified. Only those innovations that EPA management already feels have considerable potential for wide-scale adoption will be evaluated.

3.5 General Guidelines

All of the collection activities described within this ICR fall within OMB's General Guidelines.

3.6 Confidentiality

None of the information that will be collected is confidential in nature.

3.7 Sensitive Questions

No information of a sensitive nature will be required to be submitted by the respondents.

4.0 THE RESPONDENTS AND THE INFORMATION REQUESTED

4.1 Respondents and SIC Codes

Potential respondents include all entities regulated by EPA who are involved with a particular innovation and would like to participate in an evaluation or non-regulated persons or organizations that have an interest or concern in regards to a particular innovation and would like to participate in an evaluation.

4.2 INFORMATION REQUESTED

To conduct an evaluation, EPA will select a particular innovation and then identify a list of people EPA could interview to learn more about that particular innovation. EPA will then choose from a set of questions pre-approved by OMB centered around a particular agency core function, such as permitting. With these questions EPA will develop specific interview questionnaires for the different categories of persons to be interviewed. For instance, one interview questionnaire will be developed solely for project sponsors or persons in similar positions at different companies/facilities that would reasonably be interested in the innovation. Others will be developed for state, tribal, and local agency officials, academia, community stakeholders, etc. EPA plans to conduct interviews via phone with use of a third-party contractor.

Through the interviews, EPA hopes to collect following types of data:

- Description of innovation (extent to which innovation originally envisioned at start of project matches innovation in implementation)
- Predictability of innovation
- Extent to which innovation has reduced/increased administrative burden
- Extent to which innovation has resulted in environmental benefits
- Extent to which innovation has resulted in efficiencies
- Extent to which public has increased access to data a result of innovation
- Extent to which public accepts innovation
- Extent to which innovation allows for accountability
- Extent to which innovation allows for proper compliance and/or enforcement
- Extent to which innovation accounts for environmental justice concerns
- Extent to which innovation is transferable to other companies/sectors

Specifically, interview questions regarding a particular permit innovation may include the following:

- What incentives has the permit innovation provided? (e.g., reporting flexibility, reduced monitoring)
- Has the permit innovation reduced administrative burden?
- What were the expectations for environmental benefits and have they been met?
- Have the public's concerns regarding the permit innovation been adequately addressed?
- Would other companies be interested in this types of innovation?

The information collected will be mainly anecdotal though quantitative information will be collected if available. Due to the site-specific characteristics of each innovation, it will be difficult to perform any statistical comparisons of innovations centered around the same core function that would yield useful information.

5.0 THE INFORMATION COLLECTED: GOVERNMENT ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5.1 GOVERNMENT ACTIVITIES

Agency activities associated with the collection of information include:

- Develop interview questionnaire;
- Assemble data sources (mailings lists, etc.);
- Pretest interview questionnaire;
- Internal OEPI review and approval of questionnaires;
- Make initial phone calls to potential interviewees to determine whether they would like to participate in phone interviews;
- Make phone calls to determine times of interviews;
- Disseminate questionnaires to respondents;
- Perform telephone interviews;
- Gather information from respondents;
- Review data;
- Analyze results;
- Prepare findings;
- Distribute draft copy of evaluation to interviewees for review;

- Incorporate interviewee comments;
- Finalize report;
- Distribute report and make report publicly available when appropriate.

5.2 COLLECTION METHODOLOGY AND MANAGEMENT

EPA may not interview more than nine non-federal persons regarding a particular permit innovation unless it receives clearance from OMB. The supporting statement for this ICR seeks OMB and public approval for EPA's general framework for performing evaluations of innovative pilot project innovations and, in particular, approval for performing evaluations of innovative pilot permit innovations. The list of questions for innovative pilot project permit innovations are included as an attachment. If these are approved, EPA will develop different interview questionnaires based upon the questions listed in order to conduct evaluations of permit innovations. For example, from the questions listed, EPA plans to develop a single interview questionnaire for project sponsors and persons representing similar businesses/municipalities who would have reasonable interest in a specific permit innovation. From the same set of questions, EPA would also develop another interview questionnaire that would be used to interview community stakeholders, representatives from environmental groups, and academics who have a reasonable interest in the permit innovation. Once EPA completes an evaluation for a single permit innovation, EPA may choose to use the same two questionnaires when evaluating another permit innovation. However, in order to learn as much as possible about the permit innovation, EPA may need to modify the interview questionnaires slightly depending upon the potential respondent. Nevertheless, EPA will continue to draw upon the same base of permit questions included in the attachment.

When EPA plans to conduct an evaluation of an innovative pilot project innovation centered around a different agency core function, such as environmental stewardship (e.g., pollution prevention), EPA will develop another set of questions which will then be submitted to OMB along with an ICR. The ICR will be submitted as an amendment to the ICR that is the subject of this ICR supplementary statement. Once the ICR amendment is approved, EPA will then begin to develop questionnaires for respondents in the same manner discussed above. This process will be repeated whenever EPA makes the decision to begin evaluating innovative pilot project innovations centered around other agency core functions.

EPA is enlisting an external program evaluation expert to assist in establishing

interview times for those agreeing to participate in interviews, conducting the interviews, analyzing results, and compiling them.

5.3 SMALL ENTITY FLEXIBILITY

The interview questions have been developed in such a way that they would be relatively easy to respond to, with no undue burden being imposed on entities without full-time environmental managers, etc. EPA does not expect that this solicitation would impose additional burdens on small entities.

5.4 COLLECTION SCHEDULE

The first collection of information will begin in September 2002. Other evaluations will soon follow periodically throughout the three years for which this ICR is approved. Once EPA makes the determination to begin evaluating a particular innovation, the process of selecting possible persons for interviews, developing interview questionnaires, conducting interviews, performing analyses, and compiling results should require less than six months to complete.

6.0 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6.1 Estimating Respondent Burden and Cost

This section describes EPA's estimates of the burden hours and cost to complete the information collection activities associated with this collection. Two sets of respondent estimates are included below. The first set of estimates detail the burden and cost for respondents participating in evaluations of innovative pilot project innovations that EPA expects to conduct over the next three years (Total Respondents). The second set of estimates takes into account the burden and cost for respondents solely participating in permit evaluations over the next three years (Permit Respondents). Additionally, two sets of Agency estimates are included below.

It is assumed that managers, technical staff, academics, lawyers, and other persons representing a wide array of professional backgrounds will participate in the interviews. Since the potential respondents represent such a diverse group, the labor costs are estimated at \$64.00 per hour. To derive these estimates EPA referred to data from the Bureau of Labor Statistics and current EPA publications. There is no need for "developing, acquiring or utilizing technology and systems for the purpose of collecting, validating or

verifying information”, “...disclosing and providing information”, “adjusting the existing ways to comply with any previously applicable instructions or requirements”, “training personnel to be able to respond to a collection of information”, “searching data sources”, nor a need for the respondents to keep records. Burden activities include only a few steps: (1) reviewing instructions and questions in advance, (2) participating in the interview, (3) reviewing and commenting on the draft evaluation report.

No capital expenditures are needed by the respondent to complete the interview since the responses can be made using existing equipment (e.g., telephone).

No operating and maintenance costs are needed to complete the interview, since the interview activities (reviewing instructions and questions in advance, participating in the interview, and reviewing and commenting on the draft evaluation report) are one-time only activities and can be conducted using existing equipment (e.g., telephone).

Total Respondents

It is estimated that there will be 200 respondents participating annually in the innovative pilot project innovation interviews. EPA estimates that each respondent will spend approximately (1) nine hours reviewing the questions before participating in the phone interview, (2) two hours on the phone for the interview, and (3) three hours reviewing and commenting on the draft evaluation report. To fulfill all information collection requirements for respondents, EPA estimates that it will cost each respondent approximately \$576 and take approximately nine hours. The amount of time spent, however, will vary depending upon the interviewee’s level of familiarity with the particular innovation under study. The cost and burden estimates for each separate information requirement are listed below in Table 2.

Table 2. Total Respondents - Annual Estimated Respondent Burden and Cost

Collection Activity	Hours/ Evaluation/ Respondent (a)	Average Respondent Costs/Hour (b)	Respondent Costs/ Evaluation (a*b=c)	Number of Evaluations/ Year (d)	Number of Respondents/ Evaluation (e)	Total Number of Respondents/Year (d*e=f)	Total Respondent Hours/Year (a*f=g)	Total Costs/ Year (b*g)
Review of Interview Questionnaire	4	\$64	\$256	10	20	200	800	\$51,200
Interview	2	\$64	\$128	10	20	200	400	\$25,600
Review and	3	\$64	\$192	10	20	200	600	\$38,400

Comment on D r a f t Evaluation Report								
Total	9	N/A	\$576	N/A	N/A	N/A	1,800	\$115,200

Permit Respondents

It is estimated that there will be 60 respondents participating annually in the innovative pilot project permit innovation interviews. EPA estimates that each respondent will spend approximately (1) four hours reviewing the questions before participating in the phone interview, (2) two hours on the phone for the interview, and (3) three hours reviewing and commenting on the draft evaluation report. To fulfill all information collection requirements for respondents, EPA estimates that it will cost each respondent approximately \$576 and take approximately nine hours. The amount of time spent, however, will vary depending upon the interviewee's level of familiarity with the particular innovation under study, as mentioned above. The cost and burden estimates for each separate information requirement are listed below in Table 3.

Table 3. Permit Respondents - Annual Estimated Respondent Burden and Cost

Collection Activity	Hours/ Evaluation/ Respondent (a)	Average Respondent Costs/Hour (b)	Respondent Costs/ Evaluation (a*b=c)	Number of Evaluations/ Year (d)	Number of Respondents/ Evaluation (e)	Total Number of Respondents/Year (d*e=f)	Total Respondent Hours/Year (a*f=g)	Total Costs/ Year (b*g)
Review of Interview Questionnaire	4	\$64	\$256	3	20	60	240	\$15,360
Interview	2	\$64	\$128	3	20	60	120	\$7,680
Review and Comment on D r a f t Evaluation Report	3	\$64	\$192	3	20	60	180	\$11,520
Total	9	N/A	\$576	N/A	N/A	N/A	540	\$34,560

6.2 Estimating Agency Cost and Burden

This section represents EPA's estimates of the agency burden hours and cost required to complete the information collection activities associated with this collection.

Two sets of respondent estimates are included below. The first set of agency estimates detail the cost and burden for agency activities required to perform evaluations for innovative pilot project innovations that EPA chooses to evaluate over the next three years (Agency Innovation Evaluations). The second set of estimates detail the cost and burden for agency activities required to perform evaluations solely for permit innovations (Agency Permit Innovation Evaluations).

The rate used to estimate EPA hourly wage was based upon 2000 GS-13/01 salary of \$60,890 (or \$29.27) with overhead of 110% factored in, resulting in \$62/hour.

Agency Respondents -Innovative Pilot Project Innovation Evaluations

EPA anticipates using a third party contractor to assist in establishing interview times for those agreeing to participate in interviews, conducting interviews, analyzing results, and compiling them, sending out draft copies to interviewees for review and comment, incorporating comments, and finalizing the evaluation report. On its own, EPA will establish a mailing list of potential persons to be interviewed, make initial contacts to determine persons willing to be interviewed, develop interview questionnaires for the different categories of persons to be interviewed for each innovation to be analyzed, pre-test the interview questionnaires, conduct an internal EPA review and approval process for the questionnaires, and distribute the final report.

EPA estimates that it will require 1,840 agency hours per year and cost the Agency \$464,080 per year to perform all necessary evaluations, or 184 hours per evaluation per year and \$46,408 per evaluation per year.

Table 4. Agency Respondents - Annual Estimated Respondent Burden and Cost
(Innovative Pilot Project Innovation Evaluations)

Collection Activity	Agency Hours/ Evaluation	Number of Evaluations/ Year	Total Agency Hours/Year	Average Agency Cost/Hour	Agency Costs/ Evaluation	Total Costs/Year
	(a)	(b)	(a*b= c)	(d)	(a*d)	(c*d)
Agency-Only Activity						
Develop questionnaire	24	10	240	\$ 62	\$1,488	\$14,880
Pretesting interview questionnaire	80	10	800	\$ 62	\$4,960	\$49,600

Internal Agency review & approval	40	10	400	\$ 62	\$2,480	\$24,800
Develop mailing list	16	10	160	\$ 62	\$ 992	\$9,920
Make initial contacts with potential interviewees	8	10	80	\$ 62	\$496	\$4,960
Distribute final report	16	10	160	\$ 62	\$992	\$9,920
Subtotal	184	N/A	1,840	N/A	\$11,408	\$114,080
External Contractor					\$35,000	\$350,000
Total	184	N/A	1,840	N/A	\$46,408	\$464,080

Agency Respondents -Innovative Pilot Project *Permit* Innovation Evaluations

EPA anticipates using a third party contractor to assist in establishing interview times for those agreeing to participate in interviews, conducting interviews, analyzing results, and compiling them, sending out draft copies to interviewees for review and comment, incorporating comments, and finalizing the report. On its own, EPA will establish a mailing list of potential persons to be interviewed, make initial contacts to determine persons willing to be interviewed, develop interview questionnaires for the different categories of persons to be interviewed for each innovation to be analyzed, pre-test the interview questionnaires, conduct an internal EPA review and approval process for the questionnaires, and distribute the final report.

EPA estimates that it will require 552 agency hours per year and cost the Agency \$139,224 per year to perform all necessary evaluations, or 184 hours per evaluation per year and \$46,408 per evaluation per year.

Table 5. Agency Respondents - Annual Estimated Respondent Burden and Cost
(Innovative Pilot Project *Permit* Innovation Evaluations)

Collection Activity	Hours/ Agency Evaluation (a)	Number of Evaluations/ Year (b)	Total Agency Hours/Year (a*b= c)	Average Agency Cost/Hour (d)	Agency Costs/ Evaluation (a*d)	Total Costs/Year (c*d)
Agency-Only Activity						
Develop questionnaire	24	3	72	\$ 62	\$ 1,488	\$ 4,464

Pretesting interview questionnaire	80	3	240	\$ 62	\$4,960	\$14,880
Internal Agency review & approval	40	3	120	\$ 62	\$2,480	\$ 7,440
Develop mailing list	16	3	48	\$ 62	\$ 992	\$ 2,976
Make initial contacts with potential interviewees	8	3	24	\$ 62	\$ 496	\$ 1,488
Distribute final report	16	3	48	\$ 62	\$992	\$2,976
Subtotal	184	N/A	552	N/A	\$ 11,408	\$34,224
External Contractor					\$ 35,000	\$105,000
Total	184	N/A	552	N/A	\$46,408	\$ 139,224

6.3 Estimating the Respondent Universe and Total Burden Costs

EPA estimates that 200 respondents will take part in the innovative pilot project innovation evaluations each year, and of these 200 respondents, approximately 60 will take part in the innovative pilot project *permit* innovation evaluations each year.

6.4 Bottom Line Burden Hours and Cost Tables

EPA estimates that 200 respondents will take part in the innovative pilot project innovation evaluations each year. This will result in approximately 1,800 total burden hours at a cost of \$115,200. Of these 200 respondents, approximately 60 will take part in the innovative pilot project *permit* innovation evaluations each year. This will result in approximately 540 total burden hours at a cost of \$34,560.

For EPA to conduct evaluations of innovative pilot innovations each year, EPA estimates that it will require approximately 1,840 total burden hours at a cost of \$464,080. For EPA to conduct evaluations of innovative pilot *permit* innovations each year, EPA estimates that it will require approximately 552 total burden hours at a cost of \$139,224.

6.5 Reasons for Change in Burden

This new burden results from the desire of EPA to learn from the innovative pilot project innovations in general and permit innovations in particular that are emerging from the many innovative pilot projects now in implementation. Only by conducting in-depth evaluations of the most promising innovations will EPA be able to make an appropriate judgement as to whether certain innovations have merit to be adopted on a wider-scale.

6.6 Burden Statement

The annual estimated burden for respondents participating in the innovative pilot project innovation evaluations is three hours. The annual estimated burden for respondents performing in innovative permit innovation evaluations is three hours.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503. Attention: Desk Officer for EPA. Include the EPA ICR number (1993.01) and OMB control number (2010-0026) in any correspondence.

Attachment

List of Questions to be Used in Developing Permit Innovation Interview Questionnaires

The types of permit innovation evaluation questions EPA would like to ask are listed below.

I. Description of Permit Innovation Mechanism/Tool

- What is the key permit innovation of your project?
- Why did your facility/company seek out this type of permit innovation?
- Now that the innovation is in implementation, does it still fit the company's original vision?
- Has anything changed based on the permit innovation in implementation?

- What is the permit innovation mechanism/tool, specifically?
- What is the innovation mechanism/tool designed to do?
- Has the innovation mechanism/tool been used? Why or why not?
- Has the innovation mechanism/tool helped you meet the desired outcomes of your project? Why or why not?
- What unforeseen barriers have you encountered trying to use this innovation mechanism/tool?
- How long do you expect to use the innovation mechanism/tool?
- What incentives has the innovation mechanism/tool provided? (e.g., reporting flexibility, reduced monitoring, self-certification, reduced compliance testing, preapproval-New Source Review flexibility, administrative cost savings)

II. Outcomes

Time

- Has the permit innovation mechanism/tool reduced administrative burden? Please explain.
- Given the permit innovation you've described, are you finding that it's more or less burdensome to determine compliance with this innovation mechanism/tool? Why or why not?

Predictability

- Does the permit innovation mechanism/tool provide for better planning capabilities? Please explain.
- Does the innovation mechanism/tool lower the risk associated with operational changes? Please explain.

Efficiencies

- Has the permit innovation mechanism/tool resulted in significant efficiencies? Please explain.
- Has the innovation mechanism/tool resulted in significant operational benefits not already described? Please explain.
- Are there more efficient alternatives to the innovation mechanism/tool you have described? Please explain.

Environmental Benefits

- Was the permit innovation mechanism/tool adequately designed to enable environmental benefits? Please explain.
- What were the expectations for environmental benefits, and have they been met?
- What environmental benefits, specifically, did the innovation mechanism/tool provide?
- Specifically, how did the innovation mechanism/tool yield environmental benefits?
- How long did it take for the innovation mechanism/tool to begin yielding environmental benefits?
- How are you quantifying those benefits? Please be specific.
- If you are not quantifying benefits, how are you measuring those benefits?
- Has the innovation/mechanism tool resulted in other benefits or improvements to the local environment not already described? Please explain.
- Has the innovation/mechanism tool resulted in any unexpected environmental costs? Please explain.

Public Understanding/Access/Acceptance

- Have the public's concerns regarding the permit innovation mechanism/tool been adequately addressed? Please explain.
- Has the innovation mechanism/tool addressed public participation concerns? (e.g., earlier notice and involvement). Please explain.
- Has the innovation mechanism/tool addressed environmental justice concerns? Please explain.
- Has the innovation mechanism/tool provided for stakeholder information needs? (e.g., level/timing of information or activities, access to reports, etc.). Please explain.
- What efficiencies do you attribute to the innovation mechanism/tool, as a result of public participation? (e.g., time, public support, better innovation ideas, etc.)
- Has the innovation mechanism/tool resulted in other benefits to the local community and general public not already described? Please explain.
- Has the innovation mechanism/tool resulted in concerns to the local community and general public not already described? Please explain.

III. Enforceability/Accountability

- Is the permit innovation mechanism/tool adequate to support the environmental

performance baseline and meaningful public involvement?

- Does the innovation mechanism/tool ensure equal or greater compliance than standard permitting?

IV. Transferability

- What changes should be made to enhance efficiency/effectiveness of the permit innovation mechanism/tool?

- What are some complexities of the innovation mechanism/tool that still need to be addressed?

- What are the difficulties of applying this innovation mechanism/tool in the current system?

- Would other companies/facilities be interested in using this type of permit innovation mechanism/tool? Why or why not?

- What are the characteristics and needs of a company/facility that would want this type of innovation mechanism/tool? (e.g., frequent product line movements, short technology turnover cycles, continuous improvement philosophy, etc.)

- Do you know of other industries/companies who would benefit/be eligible for the same innovation mechanism/tool?

- What barriers would prevent this?

- Should this innovation mechanism/tool be adopted throughout your sector? By other sectors?

- If the permit innovation mechanism/tool was at a different facility than yours...

- Would you be interested in the innovation mechanism/tool? Why or why not?

- What would you like to see different? (to make you want something similar)

- Is there some facet of the innovation mechanism/tool you'd be interested in pursuing at your site?

- Does the permit innovation mechanism/tool need to be re-tested before it can be widely adopted by permit writers?

- If so, how, and at what scale, should the re-testing be done? (e.g., similar facility, sector, trade association)

V. Other

- Have there been any institutional behavior/culture changes resulting from the permit innovation mechanism/tool?

- What are some other intangible benefits that can be attributed to the permit innovation mechanism/tool? (e.g., facility had flexibility to make more publicly beneficial products)

- What are some intangible costs? (e.g., environmental managers' morale declined because of difficulty in implementing innovation mechanism/tool)

- What would be different without this permit innovation mechanism/tool?

- Are you/your facility/company involved in another environmental permit innovation program with EPA/State/local?
 - Describe program
 - Describe innovation
 - Compare/contrast program with this project

- Is there any other information you can provide to help us evaluate this permit innovation mechanism/tool?